From: Myounghee Noh
To: Ruelas, Cynthia
Cc: Armann, Steve; "Lee, Alan"; Eunjin Kotkovetz; melchor.a.travens@hawaii.gov
Subject: RE: Kapalama Military Base - Checklist for risk-based disposal application
Date: Monday, February 23, 2015 5:34:14 PM

Resending with correct email for Mel.

myounghee

Main 808-484-9214; Direct 808-853-3150; Mobile 808-551-2888

From: Myounghee Noh
Sent: Monday, February 23, 2015 3:33 PM
To: 'Ruelas, Cynthia'
Cc: Armann, Steve; melchlor.a.travens@hawaii.gov; 'Lee, Alan'; Eunjin Kotkovetz
Subject: RE: Kapalama Military Base - Checklist for risk-based disposal application

Cynthia –

Thank you for your email.

myounghee

Main 808-484-9214; Direct 808-853-3150; Mobile 808-551-2888

From: Ruelas, Cynthia [mailto:RUELAS.CYNTHIA@EPA.GOV]
Sent: Monday, February 23, 2015 3:18 PM
To: Myounghee Noh
Cc: Armann, Steve; melchlor.a.travens@hawaii.gov
Subject: Kapalama Military Base - Checklist for risk-based disposal application

Hello Myounghee,

I spoke with Steve Armann this afternoon regarding the PCB release at the Kapalama Military Base. Under the Spill Cleanup Policy in the Toxic Substances Control Act (TSCA)(40 C.F.R. § 761.120-135), there are four immediate actions that must take place within 24 hours (or within 48 hours for PCB Transformers) of the release. One of these requirements is that the responsible party notify the EPA regional office and the National Response Center (1-800-424-8802) of the release. Since the release date and date of discovery were in November 2014, this is way past the notification requirement in the Spill Cleanup Policy portion of the TSCA regulation. Therefore, you must proceed with the cleanup under the risk-based cleanup requirements in 40 C.F.R. § 761.61(c). One of the requirements for conducting a risk-based cleanup is to submit a risk-based disposal application.

Below is the checklist of items to be included in the risk-based disposal application:

- Written Certification
  - Include in the Application, the certification language provided in 40 C.F.R. § 761.61(a)(3)(i)

(E) as well as certification language provided in 40 C.F.R. § 761.3 under the definition for "Certification".

- 40 C.F.R. § 761.61(a)(3)(i)(E): The Certification states that "all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site are on file at the location designated in the certification and are available for EPA inspection. Person using alternate methods for chemical extraction and chemical analysis for site characterization must include in the certificate a statement that such a method will be used and that a comparison study which meets or exceeds the requirements of Subpart Q of this part, and for which records are on file, has been completed prior to verification sampling."
- 40 C.F.R. § 761.3, Definition of Certification: The Certification should also include the following language: "Under civil and criminal penalties of law for the making or submission of false or fraudulent statements or representations (18 U.S.C. 1001 and 15 U.S.C. 2615) I certify that the information contained in or accompanying this document is true, accurate, and complete. As to the identified section(s) of this document for which I cannot personally verify truth and accuracy, I certify as the company official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification that this information is true, accurate, and complete."

- This must be signed by both the owner of the property where the cleanup site is located and the party performing the cleanup.

- Pre-Cleanup Site Characterization
  - Demonstration under 40 C.F.R. § 761.61(a)(2) that site characterization is complete and data is of sufficient quality and quantity to move forward with cleanup. In addition, and, if applicable, identification of data gaps.
  - Summary of procedures used to sample (characterize contaminated and adjacent areas to determine in-situ [as found] PCB concentrations). The summary must include sample collection and analysis dates, sample locations and depths, sample extraction methods, extract pre-analysis cleanup methods, laboratory analytical methods, and laboratory acceptance limits for quality control samples.
  - Tables summarizing characterization data (all pre-cleanup PCB concentrations measured in all previously collected pre-cleanup characterization samples). Data summaries must include results for laboratory quality control samples such as matrix spikes, matrix spike duplicates, surrogate recoveries, method blanks, and any other quality control sample analyzed by the laboratory. Sample identification numbers must be included and cross-referenced in the data summary tables, and site maps and figures.
  - Nature of the PCB contamination including concentrations and kinds of PCB remediation waste (e.g., media such as soils, materials such as concrete) contaminated with PCBs.
  - Location and vertical and horizontal extent of PCB contaminated area (e.g., provide maps depicting extent of contaminated areas).

- PCB Cleanup Plan
  - Project schedule
  - Additional site characterization if determined to be necessary and to be conducted

consistent with a Sampling and Analysis Plan (SAP) approved by USEPA R9.

- Description and identification in site maps or figures of the PCB cleanup site consistent with the definition of PCB cleanup site in 40 C.F.R. § 761.3 (Definitions).
- SAP developed using data quality objectives. At a minimum, the SAP must include:
  I. Laboratory methods for sampling extraction,
  II. Extract sample cleanup,
  III. Extract analysis,
  IV. Sample collection methods for additional characterization, sample collection methods for cleanup verification samples,
  V. Laboratory quality control (QC) samples (e.g., matrix spike, matrix spike duplicates, surrogate recoveries, method blanks, and laboratory acceptance criteria for all QC samples),
  VI. Tables summarizing the number, types of samples (including QC samples), sample identification numbers, and sample locations,
  VII. Figures and maps depicting sampling locations and cross referencing the sample identification numbers included in the table,
  VIII. Laboratory Standard Operating Procedures should also be included in the SAP, and
  IX. PCB cleanup levels for each PCB remediation waste together with the laboratory detection and quantitation limits.
- PCB cleanup or action levels to be applied to the site and justification.
  - Include discussion on human and ecological receptors and habitat that may be impacted by PCB contamination.
- Site cleanup, methods for cleanup of PCB remediation waste, and waste disposal
  - Include cleanup verification;
  - Options for cleanup and preferred approach (e.g., excavation, on-site disposal) with justification, and
  - Options and contingency plans in case unanticipated higher concentrations and/or wider lateral and/or vertical distribution of PCBs are found during cleanup and/or other obstacles are encountered.
- Disposal of PCB remediation waste consistent with the requirements in 40 C.F.R. § 761.61(a)(5).
- Decontamination of sampling equipment, tools, and moveable equipment used during site characterization and cleanup consistent with the requirements in 40 C.F.R. § 761.79(c)(2), (e), (f)(2) and (g).
- Institutional controls if PCB remediation waste will be left in place consistent with EPA's conditional approval of the Application.

Under 40 C.F.R. § 761.61(c) cleanup levels must be risk-based. USEPA's Regional Screening Levels for PCBs, HDOH's cleanup level for PCBs (1.1 ppm), or a site specific risk assessment may be used to establish the cleanup levels. We can discuss these options in more detail.

Please let me know if you have any questions.

Thanks,
Cynthia

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Cynthia Ruelas
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